

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
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This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN) (and member case *Burlingame v. Bin Laden, et al.*, 02-cv-7230)

STATE OF NEW YORK)
COUNTY OF NASSAU)

CHRISTOPHER DOWDELL, hereby states under penalty of perjury that:

1. I am a resident citizen of the state of New York, born on [REDACTED] 1968, and I am the surviving stepson of Brian Magee who was killed in the September 11th attacks.

2. My mother, Valerie Magee, was married to Brian Magee on August 7, 1983.

3. My mother, two brothers and I lived with my stepfather from 1983, when I was 15 years old, until I moved out at the age of 28.

4. My mother and biological father were divorced in 1977. Unfortunately, my biological father was absent for most of my life and I have not spoken to him since 1987. Although he was supposed to pay child support and had visitation rights, he rarely visited, and even more rarely paid his court mandated support. I always admired that Brian didn't capitalize on my biological father's issues, instead he simply stepped up to fill his position and it never felt like he was anything other than my dad.

5. Brian Magee was my father in all respects other than biology. From the moment Brian moved in he immediately took on the role as father to me and my brothers. My stepfather did all the things that a natural father would do. He provided me with financial and emotional

support, teaching me, guiding me and providing all the care, companionship and nurturing that a father would give his son. He was my father.

6. We always spent holidays as a family. On Christmas Eve we would go to Brian's brother's house and we were always treated as if we were Brian's biological children. His siblings were our aunts and uncles, their children our cousins and we were always included in big family functions. Since our first Christmas as a family to this day, I have not missed a Christmas Eve with the extended Magee family.

7. Before my mother married Brian, finances were difficult, my mother struggled financially as a single mother of three young children. Brian, having gone to Chaminade High School, believed that a Catholic high school education was important and told my mom that he would provide for my tuition because he was our father. When I struggled with homework, Brian would sit and help me work through whatever problem I was caught up on.

8. After high school I went to college at the Pratt Institute. During the process of applying for financial assistance, I learned that I was not eligible because my mother and Brian claimed me as a dependent on their taxes and earned too much for me to receive financial aid. I sat down and spoke with Brian about my college tuition and he made a deal with me that he would help pay my tuition if I met him halfway. This is one of many ways in which Brian was a father, he wasn't there to give me a handout but instead wanted to provide for my education while taking the opportunity to teach me valuable life lessons.

9. Brian shared his love for motorcycles and cars with me and my brothers. He showed us how to fix our cars, from repairing a flat tire to installing new brakes. Our Saturday morning ritual was to wake up and help work on his motorcycle or one of our cars, then he would go to town to pick up lunch, and we would spend the rest of the day watching old movies together. Those Saturdays were some of the best times I spent with my father.

10. When I moved out and into my own apartment, Brian rented a truck and took countless trips to and from our house to help me move in. After I met my now wife, Brian was always there to support and give me relationship advice and even helped me shop for an engagement ring. He also helped my wife and me pay for our wedding. Brian was not only my dad but was a loving and caring father-in-law as well.

11. My wife and I bought a house around the block from my parents and Brian was there every free moment he had, helping to paint walls, cut wood, hang fixtures and he was thrilled to help any way he could. He loved being our dad and was excited to help us make our new house a home - just as he had made a loving home for my brothers and me as children.

12. Now that I have a son of my own, I realize the indelible mark he left on me and the lessons I continue to learn from him, even after his passing. It pains me to think that he never got to meet his grandchildren, my dad was custom made to be a grandfather and he would have made the best grandfather in the world.

13. I have been deeply affected by my stepfather's death and I respectfully request that the Court deem me the "functional equivalent" of Brian Magee's son for purposes of my claim for solatium damages against the Republic of Iran resulting from his death.


CHRISTOPHER DOWDELL

Sworn to before me this 19th of
December 2019


Notary Public

ANTONELLA DELUCA
Notary Public, State of New York
No. 01DE5084927
Qualified in Nassau County
Certificate Filed in New York County
Commission Expires Oct. 24, 2022